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June 19, 2001

Dr. Jane R. Summerson, EIS Document Manager
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307, Mail Stop 010
North Las Vegas, NV 89036-0307

Subject: Comments on Supplement to the Draft Environmental Impact Statement (SDEIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel (SNF) and High-Level Radioactive Waste (HLW) at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250-D-S)
Reference: Letter of 2/7/00 (attached)
Dear Dr. Summerson:

I have closely followed and provided comment on previous documents concerning the disposition of surplus weapons-grade materials, including Highly Enriched Uranium and Plutonium. The Records of Decision for both of these included conversion and fabrication into reactor fuel with subsequent disposition as SNF.

In addition, the importance of a life-cycle waste solution to the overall health of the nuclear industry is of utmost importance. A healthy nuclear industry can contribute to the nation's energy supply and to environmental efforts to reduce the nation's carbon dioxide emissions, lessening the impact of global warming.

I am pleased that the SDEIS is responsive to my referenced comments of 2/7/00 on the Draft EIS by:

1. Working towards the reduction of uncertainty by design improvements (These include greater flexibility in packaging, "aging" SNF, increased protection from water intrusion, greater drift spacing and increased ventilation);
2. Providing analysis that includes closure 300 years beyond completion of emplacement; and
3. Providing a comparison of key design and operating parameters in the Draft EIS (DEIS) and the SDEIS.

I have expectations for the Final EIS (FEIS) that go beyond the information provided in the SDEIS:

1 1. Analysis should go beyond the proportional use of primary impact indicators as given in the SDEIS.

2 2. The inventory given in Appendix A of the DEIS should be revised to include 20 year license extensions for commercial nuclear power plants.

3 3. Since additional inventory has been analyzed and the Total System Life Cycle Cost (TSLCC) document (DOE/RW-0533) includes "all SNF and HLW currently forecast", a clear statement of the DOE strategy beyond the legal limit on this action (70,000 MTHM) should be given.

4 4. It is not clear that the "S&ER flexible design" discussed in the SDEIS is the same as that used in the TSLCC document which uses a "Reference System Design" ("capable of emplacing 97,000 MTHM") from a "Project Description Document" not made available to the public. The FEIS should clarify this.

5 5. The FEIS should show a preference for particular scenarios and operating modes. The repository layout for the preferred design should be adequately addressed in section 3 as well as in an updated version of Appendix I of the DEIS.

6 6. Since the DEIS is based on the preliminary design concept and the SDEIS on the S&ER flexible design, the FEIS should be clear about its basis. If further design evolution occurs, which would significantly change the analysis, a Supplement to the FEIS should be prepared.

7 7. The recently published EPA Public Health and Environmental Radiation Standards for Yucca Mountain should be addressed in the FEIS and summarized in an appendix.

Please include me on the distribution list for the Final EIS and the Record of Decision.

Sincerely,

Barbara A. Walton

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85 N. Claymore Lane
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February 7, 2000

Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
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P.O. Box 30307, Mail Stop 010
North Las Vegas, NV 89036-0307

Subject: Comments on the Draft Environmental Impact Statement (EIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel (SNF) and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250D)

Dear Ms. Dixon:

I have closely followed and provided comment on previous documents concerning the disposition of surplus weapons-grade materials, including Highly Enriched Uranium and Plutonium. The Records of Decision for both of these included conversion and fabrication into reactor fuel with subsequent disposition as SNF. Of course, without a facility to dispose of the SNF, there is not a solution.

In addition, the importance of a life-cycle waste solution to the overall health of the nuclear industry is of utmost importance. A healthy nuclear industry may also contribute to environmental efforts to reduce the nation's carbon dioxide emissions and lessen the impact of global warming.

The difficulty of DOE's response to various, sometimes contradictory, legislation and resulting lawsuits is also appreciated.

I support the Preferred Alternative to proceed with the Proposed Action for 70,000 metric tons of heavy metal as described in section 2.6 of the draft EIS. This is partly because the short-term (about 100 years) impacts are small and the cost of the Proposed Action ($28.8 billion) is less than that of the No-Action Alternative ($51.5 to $56.7 billion).

I am pleased that the draft EIS also considers additional inventory, a retrieval contingency and receipt prior to the start of emplacement. The inclusion of three packaging scenarios, three thermal load scenarios and multiple transportation scenarios, both national and within Nevada is appropriate.

I note that Long term (100 to 10,000 years) impacts also seem to be pretty well bounded but with more uncertainty (e.g. Table 5-3, page 5-22). However, impacts beyond 10,000 years seem to need more study, indeed, DOE is planning additional studies as discussed on page 5-13. I would hope that results would be available for the final EIS. If not, the mitigation measure to delay closure up to 300 years (p. 9-16) is recommended.

Additional specific comments:

1. The repository layout for the low thermal load scenario (Figure 2-16 on page 2-26) has not been adequately addressed in section 3. I suggest that Figures 3-7 and 3-8 (p. 3-22 and 3-23) be modified to include the low thermal load footprint and that additional discussion be added as necessary.
2. The final EIS should show a preference for particular scenarios where multiple scenarios are considered..
3. Since the draft EIS is based on the preliminary design concept, the final EIS, if based on a later design, should state the difference OR state that a Supplemental EIS will be prepared, if the later, more mature design would significantly change the analysis.
4. Page 8-74, 2. incorrectly states that Figure 8-3 (p. 8-11) shows the locations of underground nuclear tests.
5. Page 8-7, bullet 2 has different numbers of waste packages given than in Table 8-34 (p. 8-60).

Please include me on the distribution list for the Final EIS and the Record of Decision.

Sincerely,

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